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9 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

10

11 In re:
11 PG&E CORPORATION, et al.
12 Debtors.

12 Case No. 19-30088
13 Chapter 11

14 In re:
14 PACIFIC GAS & ELECTRIC COMPANY, et al.
15 Debtors.

15 Case No. 19-30089
16 Chapter 11

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**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE
BY TODD AND ADELINA
MCNEIVE**

NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE; Case Nos. 19-30088, 19-30089

1 **PLEASE TAKE NOTICE** that Todd and Adelina McNeive ("the McNeives") hereby
2 requests, pursuant to Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy
3 Procedure, or pursuant to any other applicable rule or statute, that notice of all matters which may
4 come before the Court be given to the McNeives' counsel of record:

5 **GROSS & KLEIN LLP**
6 Stuart G. Gross
7 The Embarcadero
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9 San Francisco, CA 94111
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12 E-mail: sgross@grosskleinlaw.com

13 The foregoing request includes, without limitation all notices, papers, and disclosure
14 statements referred to in Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy
15 Procedure, and also includes notice of any orders, applications, complaints, demands, hearings,
16 motions, petitions, pleadings or requests, and any other documents brought before the Court in
17 this case, as well as anything concerning which the McNeives may be heard under Section 1109
18 of the Bankruptcy Code, whether formal or informal, whether written or oral, and whether
19 transmitted or conveyed by electronic mail, mail, hand delivery, telephone, telegraph, facsimile,
20 or otherwise.

21 This notice of appearance and request for special notice, as well as any subsequent
22 appearance, pleading, claim or suit, are without prejudice to and do not waive and expressly
23 reserves: (1) the McNeives' rights, remedies, claims, actions, defenses, setoffs, or recoupments, in
24 law or in equity, against the above-captioned debtor and any other person either in this case or in
25 any other action; (2) any objection which may be made to the jurisdiction of the Court; (3) the
26 McNeives' right to have final orders in non-core matters entered only after de novo review by a
27 district judge; (4) the McNeives' right to trial by jury in any proceedings or trial, in any state of
28 federal court, so triable herein or in any case, controversy or proceeding relating hereto; and (5)
the McNeives' right to have and reference withdrawn in any matter subject to mandatory or
discretionary withdrawal. This notice of appearance and request for special notice, as well as any
subsequent appearance, pleading, claim or suit, are not, shall not be deemed or construed as, a

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1 submission of the McNeives to the jurisdiction of the Court concerning any claim or the waiver of
2 any rights of the McNeives to pursue any claims against any person in any other forum, state of
3 federal, including without limitation, the jurisdiction of the Court to adjudicate non-core matters,
4 all of which rights are reserved without prejudice.

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6 Dated: February 13, 2019

GROSS & KLEIN LLP

7 By: /s/ Stuart G. Gross
8 STUART G. GROSS

9 *Attorneys for Todd and Adelina McNeive*

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